

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ST. MATTHEW'S UNIVERSITY
(CAYMAN) LTD., a Cayman Islands company,

Plaintiff,

vs.

SABA UNIVERSITY SCHOOL OF
MEDICINE FOUNDATION, a Netherland-
Antilles company; MEDICAL UNIVERSITY
OF THE AMERICAS, a St. Kitts & Nevis
company; EDUCATION INFORMATION
CONSULTANTS, INC., a Massachusetts
corporation; EDUCATIONAL INTERNATIONAL
CONSULTANTS, LLC, a Massachusetts
limited liability company; PATRICIA L. HOUGH,
M.D. an individual, and d.b.a. "Saba University
School of Medicine"; DAVID L. FREDRICK, an
individual; PANKAJ DESAI, M.D., an individual;
ASSOCIATION OF AMERICAN
INTERNATIONAL MEDICAL GRADUATES,
INC., a Nevada corporation, a.k.a.
"aaimg@yahoo.com"; THOMAS MOORE, M.D.
a.k.a. "presaaimg@hotmail.com" and
"crocdoc2004@netzero.net," an individual;
SARAH B. WEINSTEIN a.k.a.
"execsecaaimg@hotmail.com," an individual;
RACHAEL E. SILVER, an individual; and
DIEDRE MOORE, an individual,

Defendants.

Case No.: CV-S-05-0848-RCJ(LRL)

**AFFIDAVIT OF DAVID L. FREDRICK IN SUPPORT OF MOTION TO DISMISS
BY EDUCATION INFORMATION CONSULTANTS, INC.
AND EDUCATIONAL INTERNATIONAL CONSULTANTS, LLC.**

I, David L. Fredrick, being sworn under oath depose and state as follows:

1. I have reviewed the Amended Complaint in this matter in which Education Information Consultants, Inc. and Educational International Consultants, LLC. (hereafter both “the EIC Entities”) are named defendants.

2. My primary residence is in Sarasota County, Florida, as alleged in the Amended Complaint.

3. I reiterate and incorporate herein my affidavit of March 10, 2006, and submit this affidavit without in any way waiving my pending Motion to Dismiss the Amended Complaint for lack of personal jurisdiction.

4. I am Manager of the EIC Entities, which are respectively a Massachusetts corporation and a Massachusetts Limited Liability Corporation. Both of the EIC Entities do business only in Massachusetts.

5. Neither I nor the EIC Entities have ever engaged in business with or solicited business from anyone in the State of Nevada.

6. Neither I nor the EIC Entities had any involvement in the incorporation of defendant American International Medical Graduates, Inc. (“AAIMG”). Neither I nor the EIC Entities have ever had any involvement in the activities of AAIMG or exercised any authority over AAIMG.

7. The EIC Entities have not participated in, conspired to commit, authorized, aided, abetted, furnished the means to perform, advised or encouraged any of the activities which the Amended Complaint alleges were performed by the other defendants in this matter in connection with the formation of AAIMG or in connection with statements made and actions allegedly taken by them and/or AAIMG with respect to St. Matthew’s University (CAYMAN) LTD.

8. I categorically deny any acts of wrongdoing on the part of the EIC Entities directed towards St. Matthew's University. I also categorically reaffirm my denial of any acts of wrongdoing directed towards St. Matthew's University.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 5th DAY
OF April, 2006.



DAVID L. FREDRICK

THE COMMONWEALTH OF MASSACHUSETTS

Worcester, ss.

On this 5th day of April 2006, before me, the undersigned notary public, personally appeared David C. Fugère proved to me through satisfactory evidence of identification, which was ☐ photographic identification with signature issued by a federal or state governmental agency, ☐ oath or affirmation of a credible witness, ☒ personal knowledge of the undersigned, to be the person whose name is signed on the preceding or attached document(s), and acknowledged to me that (he/she) signed it voluntarily for its stated purpose. (as attorney in fact for _____).

(official seal)



Notary Public

My commission expires:

MICHAEL P. ANGELINI
NOTARY PUBLIC
MY COMMISSION EXPIRES: DECEMBER 17, 2010